REMARKS

Applicant respectfully requests reconsideration of the present application in view of the reasons that follow.

A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Claims 1-9 remain pending in this application.

Claim Rejections - 35 U.S.C. § 103

A. Claims 1-4 and 6-9 (Ayyadurai, Whitmyer, Posner and Outlook)

On page 2 of the Office Action, claims 1-4 and 6-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent 6,718,368 to Ayyadurai (hereafter "Ayyadurai") in view of U.S. patent 6,182,078 to Whitmyer, Jr. (hereafter "Whitmyer"), in further view of U.S. Patent Publication Application No. 2003/0208434 to Posner (hereafter "Posner"), in further view of Microsoft® Outlook 2000 (hereafter "Outlook").

Claim 1 recites that a method of processing an inbound transaction document sent by a trading partner to a user in an electronic commerce system comprises, *inter alia*, receiving the inbound document at an interface for communication with trading partners, automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document without performing a language analysis of a content of the inbound document, receiving a user selection of a reply transaction document from said candidate set, and automatically populating the selected reply document with said transaction data.

1. Ayyadurai

In the rejection, it is asserted that Ayyadurai teaches automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document, but it is admitted that Ayyadurai fails to disclose or suggest without performing a language analysis of a content of the inbound document, each candidate reply transaction document being a reply to the inbound document

independent of any other candidate reply transaction document. While Applicant agrees with the admission, Applicant respectfully disagrees with the assertion.

As in the preceding Office Action, the Examiner asserted that Ayyadurai discloses the limitation of "automatically determining a set of candidate reply transaction documents" with reference to Fig. 3 – (91) and col. 6, lines 15-24 *et seq*, stating that "Ayyadurai teaches that based upon the determining parsing tags, the automatic reply generator retrieves from a library of phrases the candidate reply documents that are appropriate." Page 3 of Office Action. Thus, the Examiner is asserting that each phrase retrieved from the library corresponds to a candidate reply document.

As explained in detail in the Amendment of September 28, 2006, the asserted correspondence between each phrase retrieved from the library and a candidate reply document is erroneous. In response to receiving a message (i.e., an e-mail), Ayyadurai discloses that an automatic reply composer 91 uses tags detected from the received message to retrieve partial replies or reply phrases 92 from a library of phrases 90 for each issue and request presented in the message and introductory phrases based on the attitude of the customer (col. 6, lines 15-24). Table 7 in Ayyadurai shows an exemplary two-issue message received from a customer, and Table 10 in Ayyadurai shows a text message composed in response to the message of Table 7 based on the processing steps of Table 8 and the phrase database of Table 9 (col. 6, line 23 – col. 7, line 30).

In contrast to claim 1, Ayyadurai fails to disclose or suggest "automatically determining **a set of candidate reply transaction documents** associated with the inbound document and the particular trading partner that sent the inbound document." Rather, as explained above, Ayyadurai merely discloses determining a single document, i.e., a single text message, which is composed of multiple phrases selected in accordance with the received message. In other words, Ayyadurai does not determine a set of documents in response to a message, but only a single document, as clearly shown by Table 10.

The failure to disclose automatically determining a set of documents is consistent with the admitted failure of Ayyadurai to disclose or suggest "receiving a user selection of a reply transaction document from said candidate set." Page 6 of Office Action. Since Ayyadurai

only determines a single document in response to the received message, there is necessarily no document to select from a set of documents.

In summary, Ayyadurai fails to disclose or suggest "automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document" because Ayyadurai only discloses determining a single document, not a set of documents.

2. Whitmyer

Even if combinable, Whitmyer fails to cure the deficiencies of Ayyadurai. Whitmyer discloses that software executing on a professional computer 12 automatically queries a docket database 14 by date to retrieve a client reminder 32, which contains a matter identification number 34 and a type of reminder identification 36 identifying the type of professional service to which the reminder pertains (col. 4, lines 30-37). Software also queries a client information database 38 by the matter identification number 34 to retrieve client information 40, which contains the client name, the individual professional responsible for the client, the client e-mail address, and the name of the client contact person, and queries a response forms database 42 containing a plurality of response forms/client notices 44 by the type of reminder identification 36 to retrieve the applicable response form/client notice 44 (col. 4, lines 37-49).

Whitmyer further discloses that software automatically merges the date and the client information 40 with the form/notice 44, and automatically transmits the merged form/notice 46 by email through an Internet communication link 18 to a client computer 20, the merged form/notice 46 containing the client's options regarding the professional services to be performed (col. 4, lines 52-57). Client computer 20 receives the merged form/notice 44, allows a client to choose a desired option, and generates a reply email 22 based on the client's response, through the Internet communication link 18 to the professional computer 12 (col. 4, lines 61-65).

Just like Ayyadurai, Whitmyer discloses determining only a single form/notice 44 not a set of documents, as recited in claim 1. Although Whitmyer discloses that a database 42 contains a plurality of forms/notices 44, Whitmyer discloses that only one form/notice 44 is selected based on the type of reminder identification 36.

The failure to disclose automatically determining a set of documents is consistent with the admitted failure of Whitmyer to disclose or suggest "receiving a user selection of a reply transaction document from said candidate set." Page 6 of Office Action. Since Whitmyer only determines a single form/notice 44 in response to the type of reminder identification 36, there is necessarily no document to select from a set of documents. The only selection made by a user is to select the professional service to be performed, not which document to select for a candidate set.

Accordingly, even if combinable, claim 1 is patentably distinguishable from the combination of Ayyadurai and Whitmyer because both references fail to disclose or suggest "automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document."

3. Posner

Posner discloses that a purchasing agent can create a purchase order by accessing a template manager module 122, which can be configured to maintain many different purchase order templates having various terms (see ¶ [0050]). Even though Posner discloses that multiple templates may be available, Posner fails to disclose or suggest that the set of the templates are automatically determined and fails to disclose or suggest that the set of templates are determined based on the inbound document and the particular trading partner that sent the inbound document. Rather, Posner merely discloses that a purchasing agent manually reviews a list of templates accessed through the template manager module 122, and that the list of templates is not determined according to an inbound document and the particular trading partner that sent the inbound document.

4. Outlook

Like Ayyadurai, Whitmyer, and Posner, Outlook also fails to disclose or suggest "automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document." Outlook is merely cited for the proposition of providing a link to a document in a screen of a mailbox application, but does not disclose or suggest automatically determining a set of candidate reply transaction documents, nor determining the set according to the type of inbound document or the partner sending the document.

5. Conclusion

Accordingly, each of the cited references fails to disclose or suggest "automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document." Thus, even if combinable, claim 1 is patentably distinguishable from the combination of Ayyadurai, Whitmyer, Outlook, and Posner. Claims 2-4 and 6-7 are patentably distinguishable from the asserted combination by virtue of their dependence from claim 1, as well as their additional limitations. Claims 8 and 9 are patentably distinguishable from the asserted combination for reasons analogous to claim 1.

B. Claim 5 (Ayyadurai, Whitmyer, Posner, Outlook, and Kennedy)

On page 9 of the Office Action, claim 5 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Ayyadurai, Whitmyer, Posner, and Outlook in view of U.S. Patent No. 6,651,217 to Kennedy et al. (hereafter "Kennedy"). Applicant respectfully traverses these rejections for at least the following reasons.

With respect to the rejection of claim 5 over the combination of Ayyadurai and Kennedy, it is noted that claim 5 depends from claim 1. Like Ayyadurai, Whitmyer, Posner, and Outlook, Kennedy also fails to disclose or suggest "automatically determining a set of candidate reply transaction documents associated with the inbound document and the particular trading partner that sent the inbound document," as recited in claim 1. Accordingly, even if combinable, claim 5 is patentably distinguishable from the combination of Ayyadurai and Kennedy by virtue of their dependence from claim 1, as well as its additional recitations.

In view of the above, applicant believes that the present application is now in condition for allowance. An early notice of the same is respectfully solicited. The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a

check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. § 1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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